1	Lindsey H. Morales, Esq.		
2	State Bar No. 11519 McCALLA RAYMER LEIBERT PIERCE, LLP		
3	1635 Village Center Circle, Suite 130		
	Las Vegas, Nevada 89134 Telephone: (702) 425-7267		
4	Facsimile: (702) 444-3103		
5	Attorney for JPMorgan Chase Bank, N.A.		
6	UNITED STATES DIS	STRICT COURT	
7	DISTRICT OF NEVADA		
8	****		
9	MARGARET A. VANHANEGHAN,	Case No.: 2:18-cv-00586	
10	Plaintiff,		
11	v.	STIPULATION AND ORDER TO EXTEND	
12	CHASE BANK USA, N.A., HYUNDAI MOTOR	DEADLINE FOR DEFENDANT JPMORGAN CHASE BANK, N.A TO RESPOND TO	
13	AMERICA, CAPITAL ONE, N.A., PULTE MORTGAGE LLC and EQUIFAX	PLAINTIFF'S COMPLAINT (FIRST REQUEST)	
14	INFORMATION SERVICES LLC,	1.1. (0.2.5.1)	
15	Defendants.		
16	:		
17	IT IS HERERY STIPLII ATED by and be	tween Plaintiff Margaret A Vanhaneghan	
18	IT IS HEREBY STIPULATED by and between Plaintiff Margaret A. Vanhaneghan (hereafter "Plaintiff") through her attorney Michael Kind, Esq., and Lindsey H. Morales, Esq.		
19	attorney for Defendant JPMorgan Chase Bank, N.A., incorrectly sued as Chase Bank USA, N.A.,		
20	(hereafter "Chase") that Defendant Chase may have additional time within which to answer or		
21	otherwise respond to Plaintiff's Complaint. Specifically, the parties have agreed to extend		
22	Defendant's time to respond by an additional 30 days; therefore, Defendant may answer or		
23	otherwise respond to Plaintiff's Complaint on or before June 03, 2018.		
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1	The parties further agree that good cause exists for this extension. The amended		
2	response deadline allows Defendant to continue investigating the matter and for the parties to		
3	continue their productive discussions regarding the dispute.		
4	Signed this <u>26th</u> day of <u>April</u> , 2018	Signed this <u>26th</u> day of <u>April</u> , 2018	
5			
6	McCALLA RAYMER LEIBERT PIERCE, LLP		
7		By: <u>/s/ Michael Kind</u> Michael Kind, Esq.	
8	Nevada Bar No. 11519	Nevada Bar No. 13903	
9	11	Kazerouni Law Group, APC 6069 S. Fort Apache Road, Suite 100	
10	Las Vegas, Nevada 89134	Las Vegas, Nevada 89148	
11	II ' '	(800) 400-6808 Attorney for Plaintiff	
12			
13	Signed this 26th day of April , 2018		
14			
15	By: <u>/s/ David H. Krieger</u> David H. Krieger, Esq.		
16	Nevada Bar No. 9086		
17	Haines & Krieger, LLC 8985 S. Eastern Ave., Suite 350		
18	Henderson, Nevada 89123 (702) 880-5554		
19	Attorney for Plaintiff		
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ORDER IT IS ORDERED. Defendant shall answer or otherwise respond to Plaintiff's Complaint on or before June 03, 2018. April _____, 2018. Dated this _27th _ day of ____ Submitted by: /s/ Lindsey H. Morales Lindsey H. Morales, Esq. McCalla Raymer Liebert Pierce LLP 1635 Village Center Circle, Suite 130 Las Vegas, Nevada 89134 Lindsey.morales@mccalla.com